

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

JURY TRIAL DEMANDED

JOINT MOTION TO AMEND DOCKET CONTROL ORDER

Plaintiff Headwater Research, LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) (all together, the “parties”) respectfully file this Joint Motion to Amend the Docket Control Order entered in the above-captioned case and would show the Court as follows:

The parties have been diligently working to complete expert discovery in advance of the expert discovery, *Daubert*, Motions to Strike, and Motions for Summary Judgment deadlines, but have encountered unavoidable conflicts and other circumstances that provide good cause to modify the schedule as set forth in Exhibit A. Expert discovery is currently set to close on July 1, 2025, and the parties’ opening *Daubert*, Motions to Strike, and Motions for Summary Judgment deadline is currently set for July 3, 2025. Samsung’s technical expert, Dr. Daniel Schonfeld, is out of the country and unavailable for deposition until July 9 and 10, and Headwater’s expert, Dr. Groehn, is similarly out of the country due to a family issue and unavailable until the week of July 7, after the current deadline for opening *Daubert* and Summary Judgment motions. To give the parties additional time to schedule depositions, to keep the briefing schedule consistent among issues and

experts, and, given the intervening July 4th holiday, the parties request an extension to the expert discovery deadline from July 1 to July 11, and the *Daubert*, Motions to Strike, and Motions for Summary Judgment deadlines, from July 3 to July 14 for opening briefs, and from July 21 to July 28 for opposition briefs. The parties do not request an extension on any other deadlines.

Accordingly, the parties respectfully request that the Court grant this Joint Motion and enter the accompanying Fourth Amended Docket Control Order. *See* Ex. A.

Dated: June 23, 2025

Respectfully submitted,

/s/Katherine H. Reardon

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served June 24, 2025, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/Katherine H. Reardon

Katherine H. Reardon

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/Katherine H. Reardon

Katherine H. Reardon